

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>JOHNNY M. HUNT,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>Case No. 3:23-cv-00243</b>
	)	
<b>SOUTHERN BAPTIST CONVENTION;</b>	)	<b>Judge Campbell</b>
<b>GUIDEPOST SOLUTIONS LLC; and</b>	)	<b>Magistrate Judge Frensley</b>
<b>EXECUTIVE COMMITTEE OF THE</b>	)	<b>Jury Demand</b>
<b>SOUTHERN BAPTIST CONVENTION,</b>	)	
	)	
<b>Defendants.</b>	)	

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**MOTION FOR LEAVE TO FILE UNDER SEAL**

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Pursuant to Rules 5.03 and 7.01 of the Local Rules of Court and the Amended Agreed Protective Order previously entered in this action (ECF Doc. No. 83), Plaintiff Johnny M. Hunt respectfully submits this Motion for Leave to File Under Seal the unredacted form of the Joint Discovery Dispute Statement, as well as certain exhibits thereto, submitted by Plaintiff and Defendant Guidepost Solutions LLC (“Guidepost”) on January 9, 2024 (ECF Doc. No. 100) until such time as the Court adjudicates the issues set forth in the Joint Discovery Dispute Statement.

There are a total of twenty-five (25) exhibits accompanying the aforementioned Joint Discovery Dispute Statement (ECF Doc. No. 100), three (3) of which have been designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” under the Amended Agreed Protective Order (ECF Doc. No. 83). In addition, three (3) more of the exhibits, which have been filed publicly in redacted form pursuant to Local Rule 5.03(c), contain references to information that has been designated as “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” under the Amended Agreed Protective Order. There are also portions of the Joint Discovery

Dispute Statement itself that contain references to information that has been designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” under the Amended Agreed Protective Order, which has also resulted in the public filing of the Joint Discovery Dispute Statement in redacted form pursuant to Local Rule 5.03(c).

As set forth in the Joint Discovery Dispute Statement submitted by Plaintiff and Guidepost on January 9, 2024 (ECF Doc. No. 100), Plaintiff objects to and opposes Guidepost’s “Highly Confidential – Attorneys’ Eyes Only” designations in its document productions under the Amended Agreed Protective Order. Without conceding the propriety or the merits of the “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” designations by Guidepost, Plaintiff files the instant motion in an effort to ensure compliance with the Local Rules of the Court and the Amended Agreed Protective Order previously entered in this action on December 4, 2023 (ECF Doc. No. 83), until such time as the Court adjudicates the issues in the Joint Discovery Dispute Statement submitted by Plaintiff and Guidepost on January 9, 2024 (ECF Doc. No. 100).

For the foregoing reasons, and without conceding the merits of the “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” designations by Guidepost, this Court should review the exhibits accompanying the instant motion and the unredacted version of the Joint Discovery Dispute Statement under seal until such time as the Court adjudicates the issues set forth in the Joint Discovery Dispute Statement submitted by Plaintiff and Guidepost on January 9, 2024 (ECF Doc. No. 100).

[SIGNATURE BLOCKS AND CERTIFICATE OF SERVICE TO FOLLOW]

Dated: January 9, 2024

Respectfully submitted,

s/ Andrew Goldstein

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## **CERTIFICATE OF SERVICE**

I hereby certify that I caused a true and correct copy of the foregoing Motion for Leave to File Under Seal to be electronically filed with the Clerk of the Court on January 9, 2024, using the CM/ECF system, which will automatically serve all counsel of record listed below:

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